REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1, 4-9, 14-17, and 19 are currently pending, Claims 1, 4-9, 14-17, and 19 having been amended, and Claims 2, 3, 10-13, and 18 having been canceled without prejudice or disclaimer. The changes and additions to the claims do not add new matter and are supported by the originally filed specification, for example, on page 30, line 26 to page 31, line 7; and original Claims 1, 2, 3, and 10-13.

In the outstanding Office Action, Claims 18 and 19 were rejected under 35 U.S.C. §101 as being directed to non-statutory subject matter; Claims 1-4, and 17 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kashigi et al. (U.S. Patent No. 4,218,710, hereinafter "Kashigi") in view of Lu (U.S. Patent Publication No. 2003/0156824, hereinafter "Lu"); Claims 18 and 19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kashigi in view of Lu and the 1984 publication "Structured Computer Organization" by Tanenbaum, hereinafter "Tanenbaum"; Claims 1-4 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar (U.S. Patent No. 4,360,831) in view of Windrem (U.S. Patent No. 5,315,390); Claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar in view of Windrem in further view of Jetha et al. (U.S. Patent No. 6,661,426, hereinafter "Jetha"); Claims 6-8 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar in view of Windrem in further view of Waki et al. (U.S. Patent No. 6,888,577, hereinafter "Waki"); Claims 9-10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar in view of Windrem; Claims 11-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar in view of Windrem and Waki; Claims 15-16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar in

view of Windrem, Waki, and Jetha; and Claim 17 was rejected under 35 U.S.C. §103(a) as being unpatentable over Kellar in view of Windrem.

With respect to the rejection of Claim 19 under 35 U.S.C. §101, Applicants respectfully submit that the present amendment to claim 19 reciting a "computer readable record medium on which a reproduction program has been recorded, the reproduction program includes instructions which when executed by a computer causes the computer to execute a reproduction method, the method comprising," in accordance with MPEP 2101.06. Accordingly, Applicants respectfully request that the rejection of Claim 19 under 35 U.S.C. §101 be withdrawn.

With respect to the rejection of Claim 1 under 35 U.S.C. §103(a), based on the combination of Kashigi and Lu, Applicants respectfully submit that the present amendment to Claim 1 overcomes this ground of rejection. Amended Claim 1 recites, *inter alia,*

> a first plane memory configured to store first moving picture data reproduced from a recording medium;
>
> a second plane memory configured to store second moving picture data reproduced from the recording medium;
>
> a selection means for selecting at least one of an output of the first plane memory and the second plane memory on a pixel-by-pixel basis,
>
> a down converter configured to reduce a size of the first moving picture or the second moving picture;
>
> a third plane memory configured to store presentation graphics data reproduced from the recording medium;
>
> a fourth plane memory configured to store interactive graphics data reproduced from the recording medium;
>
> a first combining means for combining an output from the selection means and the presentation graphics data stored in the third plane memory; and
>
> a second combining means for combining an output from the first combining means and the interactive graphics data stored in the fourth plane memory.

Applicants submit that Kashigi and Lu fail to disclose or suggest at least these features of amended Claim 1.

Kashigi describes a digital video effect system with only one-frame RAM to produce a mixed and phase-locked signal for multiple individually synchronized input television signals. (See Kashigi Abstract). Kashigi, in Figure 5, shows a compression control circuit 139 to compress first through fourth pictures by half on a linear scale and to combine the compressed pictures into a composed picture. (See Kashigi, col. 9, lines 15-20, Figure 5). The compression circuit 139 includes horizontal and vertical interpolators 151, 152 to compress the pictures and to insure continuity and linearity of the composed picture. (See Kashigi, col. 9, lines 25-28).

The Office Action appears to assert that the compression circuit 139 of Kashigi corresponds to "reduced moving picture data of which the moving picture data have been reduced corresponding to a display position thereof," as recited in original Claim 4. (See Office Action, page 7, citing Kashigi, 139 of Figure 5). Kashigi merely describes compressing pictures via horizontal and vertical interpolators. (See Kashigi, col. 9, lines 37-44). However, Kashigi does not describe utilizing a down converter to reduce the size of a moving picture.

Lu has been considered but fails to remedy the deficiencies of Kashigi with regard to amended Claim 1. Therefore, Applicants submit that amended Claim 1 (and all associated dependent claims) patentably distinguishes over Kashigi and Lu, either alone or in proper combination.

Therefore, Kashigi and Lu do not disclose or suggest "a first plane memory configured to store first moving picture data reproduced from a record medium; a second plane memory configured to store second moving picture data reproduced from the record medium; a selection means for selecting at least one of an output of the first plane memory

and the second plane memory on a pixel-by-pixel basis; ***a down converter to reduce the size of the first moving picture or the second moving picture***," as recited in amended Claim 1.

With respect to the rejection of Claim 1 under 35 U.S.C. §103(a), based on the combination of Kellar and Windrem, Applicants respectfully submit that the present amendment to Claim 1 overcomes this ground of rejection.

Kellar describes a multiple picture image manipulation system for receiving video information related to a plurality of pictures and displaying the pictures according to output priority. (See Kellar Abstract). Kellar further describes manipulating a plurality of pictures previously reduced in size. (See Kellar, col. 1, lines 6-7).

The Office Action appears to assert that Figure 2 showing images 1-5 of Kellar corresponds to "reduced moving picture data of which the moving picture data have been reduced corresponding to a display position thereof," as recited in original Claim 4. (See Office Action page 9, citing Kellar, 1-5 of Figure 2). Kellar, in Figure 2, shows five frame stores 15-19 wherein each store contains an image which was previously reduced in size. (See Kellar, col. 3, lines 8-12, Figure 2). However, Kellar merely describes storing multiple images which are reduced in size. Kellar does not describe a process utilizing a down converter to reduce the size of a moving image.

Windrem has been considered but fail to remedy the deficiencies of Kellar with regard to amended Claim 1. Therefore, Applicants submit that amended Claim 1 (and all associated dependent claims) patentably distinguishes over Kellar and Windrem, either alone or in proper combination.

Therefore, Kellar and Windrem do not disclose or suggest "a first plane memory configured to store first moving picture data reproduced from a record medium; a second plane memory configured to store second moving picture data reproduced from the record medium; a selection means for selecting at least one of an output of the first plane memory

and the second plane memory on a pixel-by-pixel basis; ***a down converter to reduce the size of the first moving picture or the second moving picture***," as recited in amended Claim 1.

Applicants note that the Office Action relies on Waki to disclose "first combining means for combining the output of the selection means and subtitle data reproduced form the record medium; and second combining means for combining the output of the first combining means and video data reproduced from the record medium," as recited in original Claim 6. (See Office Action, page 10). Waki describes a first composition unit which merely combines a plurality of image files to generate a composite image and a second composition unit which determines α values that indicate the transparency of the pixels of a video image. (See Waki, col. 10, ll. 34-15, 56-59, col. 12, ll. 20-23). In addition, Waki describes a third composition unit to sum the composite image and a composite of the α values and the video image. However, Waki does not describe selecting an output from a first or second memory on a pixel-by-pixel basis, combining the selected output with presentation graphics data stored in a third memory, and then combining the initial combination with interactive graphics data stored in a fourth memory.

Therefore, Waki does not disclose or suggest "a selection means for selecting at least one of an output of the first plane memory and the second plane memory on a pixel-by-pixel basis ... a third plane memory configured to store presentation graphics data reproduced from the recording medium; a fourth plane memory configured to store interactive graphics data reproduced from the recording medium; a first combining means for combining an output from the selection means and the presentation graphics data stored in the third plane memory; and a second combining means for combining an output from the first combining means and the interactive graphics data stored in the fourth plane memory," as recited in amended Claim 1.

Accordingly, Applicants respectfully submit that amended Claim 1 (and all associated dependent claims) patentably distinguishes over Kashigi, Lu, Kellar, Windrem, and Waki either alone or in proper combination.

Tanenbaum, and Jetha, have been considered but fail to remedy the deficiencies of Kashigi, Lu, Kellar, Windrem, and Waki with regard to amended Claim 1. Therefore, Applicants submit that amended Claim 1 (and all associated dependent claims) patentably distinguishes over Kashigi, Lu, Kellar, Windrem, Waki, and Jetha, either alone or in proper combination.

Consequently, in light of the above discussion and in view of the present amendment, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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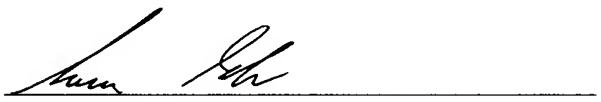

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